

LAW OFFICE OF RAYMOND CHANDLER
Raymond Chandler (SBN 217827)
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Attorney for creditors Jiame Calderon
and the three minor children of Jiame Calderon
and Anna Calderon (deceased)

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In the Matter of:

TULARE REGIONAL HEALTHCARE
DISTRICT

Debtor.

Case No.: 17-13797-9

DC No.: RDC-1

Chapter 9

Date: November 1, 2017

Time: 9:30 a.m.

Place: 2500 Tulare Street

Fresno, CA 93721

Dep't. B, Courtroom 13, 5th Fl.

Judge: Hon. Rene Lastreto II

(Filed concurrently with Notice and Motion)

**DECLARATION OF RAYMOND CHANDLER IN SUPPORT OF MOTION OF JIAME
CALDERON AND THE THREE MINOR CHILDREN OF JIAME CALDERON AND
ANA CALDERON (DECEASED) FOR RELIEF FROM AUTOMATIC STAY AND
WAIVER OF 14-DAY HOLD**

I, Raymond Chandler declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of California and before the U.S. Federal District Courts for the Eastern District of California, and I am counsel for Movant in this bankruptcy action and co-counsel for Movant in the underlying wrongful death

1 action. I have personal knowledge of the facts set forth herein and if called to testify I could
2 and would testify competently thereto.

3 2. I make this declaration in support of the "Motion of Jiame Calderon and the Three
4 Minor Children of Jiame Calderon and Ana Calderon (Deceased) for Relief From Automatic
5 Stay and Waiver of 14-Day Hold."

6 3. On January 11, 2017, after lengthy state and federal tort claim procedures, Jiame
7 Calderon and the three minor children of Jiame and Ana Calderon ("Movants") were finally
8 able to file, and did file, a Complaint for wrongful death in the Federal District Court for the
9 Eastern Division of California. A true and correct copy of said Complaint is attached hereto as
10 **Exhibit A).**

11 4. As alleged in the Complaint, on October 13, 2015, Ana Calderon, then age 39, gave
12 birth to her third child with Jiame Calderon at Tulare Regional Medical Center ("TRMC" a.k.a.
13 Tulare Local Healthcare District, Debtor herein). There were no complications to mother or
14 baby.

15 5. As alleged in the Complaint, on the day following the birth, Ana Calderon underwent a
16 bilateral tubal ligation at TRMC. Within a very short period of time after the procedure Ana
17 Calderon suffered massive internal bleeding resulting in irreversible anoxic brain injury (brain
18 death), and several days later she died.

19 6. At the time of Ana Calderon's death the three minor children of Jiame and Ana
20 Calderon were 12 years old, one year old and a newborn.

21 I declare under penalty of perjury under the laws of the State of California and the
22 United States that the foregoing is true and correct.

23
24 Executed on the 13 day of October, 2017, at Santa Barbara, California.

25
26 
27 Raymond Chandler
28

EXHIBIT A

**THE TRIAL LAW OFFICES OF
BRADLEY I. KRAMER**
BRADLEY I. KRAMER (SBN 234351)
8840 Wilshire Blvd., Suite 350
Beverly Hills, California 90211
Telephone: (310) 289-2600
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Attorneys for Plaintiff Jiame Calderon
and the following minor children of Jiame Calderon
and Anna Calderon (deceased): Robert Calderon,
Manuel Calderon and Matthew Calderon

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

JIAME CALDERON, an individual;
RC, a minor child;
MC, a minor child;
MC, a minor child,

Plaintiffs,
v.

ADANNA IKEDILO, M.D;
TULARE REGIONAL MEDICAL CENTER;
and DOES 1 through 25, Inclusive,
Defendants.

Case No.: _____

COMPLAINT FOR WRONGFUL DEATH

(REQUEST FOR TRIAL BY JURY)

(Civil Cover Sheet Attached)

1 Plaintiff JIAME CALDERON and the three minor children of JIAME CALDERON
2 and ANA CALDERON (the latter now deceased), RC. MC and MC (collectively "Plaintiffs"),
3 hereby complain and allege against ADANNA IKEDILO, M.D. ("Dr. Ikedilo"), TULARE
4 REGIONAL MEDICAL CENTER ("TRMC") and DOES 1 through 25, inclusive, (collectively
5 "Defendants"), as follows:

6
7 JURISDICTION

8 1. The events giving rise to the causes of action alleged herein occurred in the State
9 of California, County of Tulare, as that is where Plaintiffs resides, where Defendants do
10 business, and where the relevant incident occurred.

11 2. Plaintiffs are informed and believe that Dr. Ikedilo practices medicine at a
12 federally funded medical clinic and TRMC provides hospital services in a federally funded
13 hospital district, and therefore Dr. Ikedilo is an employee of the federal government. Under 42
14 U.S.C. 233 and L.R. 102(d) the proper jurisdiction for this action is the Federal District Court for
15 the Eastern Division of California located in the City of Fresno, California.

16 3. On July 15, 2016, Plaintiffs filed an administrative tort claim under the Federal
17 Tort Claims Act with the U.S. Department of Health and Human Services (DHHS).

18 4. On or about December 16, 2016, Plaintiff received a letter from DHHS denying
19 their tort claim and informing Plaintiffs that a complaint must be filed within six months of that
20 letter. A copy of the aforesaid DHHS letter is attached hereto as **Exhibit A**.

21 5. Local Rule 202(a) provides that in lieu of the appointment of representative or a
22 guardian ad litem, the attorney for the minor may, upon commencement of the action, present "a
23 showing satisfactory to the court that no such appointment is necessary to ensure adequate
24 representation of the minor."
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1 6. Bradley I Kramer, counsel for all Plaintiffs including the minors, is a medical
2 doctor and an attorney licensed to practice before the courts of the State of California and this
3 District Court, and he has extensive experience in representing minors in medical negligence and
4 wrongful death actions. (See Declaration of Bradely I. Kramer attached hereto as **Exhibit B**).

5 7. Plaintiff Jiame Calderon is the natural and legal father of the three minor
6 Plaintiffs herein and consents to the representation of the minor children by Bradely I. Kramer
7 and Raymond Chandler. (See Declaration of Jiame Calderon with (redacted) birth certificates of
8 minor children attached thereto as **Exhibit C**).

9
10 THE PARTIES

11 8. At all times mentioned herein Plaintiff Jiame Calderon was an individual residing
12 in the county of Tulare, California. Jiame Calderon is the husband of the now deceased Anna
13 Calderon and father of the three minor children of Jiame Calderon and Ana Calderon.

14 9. At all times herein mentioned herein Plaintiffs Robert Calderon (age 13), Manuel
15 Calderon (age 2) and Matthew Calderon (age 1) were the three minor children of Jiame Calderon
16 and Ana Calderon (now deceased).

17 10. Plaintiffs are informed and believe and thereon allege that Dr. Ikedilo is a
18 physician residing and doing business in the County of Tulare, California.

19 11. Plaintiffs are informed and believe and thereon allege that TRMC is a hospital
20 located in the County of Tulare, California.

21 12. The true names and capacities, whether individual, plural, corporate, partnership,
22 associate, or otherwise, of the defendants named herein as DOES 1 through 25, inclusive, are
23 unknown to Plaintiffs who therefore sue such defendants by such fictitious names. Plaintiff is
24 informed and believes and thereon alleges that each of the defendants designated herein as
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1 referred to, and negligently, tortiously, and unlawfully, proximately caused injury and damages
2 to Plaintiff as alleged herein. Plaintiff will seek leave of Court to amend this Complaint to show
3 defendants' true names and capacities after the same have been ascertained.

4 13. Plaintiffs are informed and believe and thereon allege that each defendant was the
5 agent and employee of each other defendant, and in doing the things hereinafter alleged, acted
6 within the scope and course of such agency and employment, and that each defendant has ratified
7 and approved the acts of each other defendant.
8

9 GENERAL ALLEGATIONS

10 14. On October 13, 2015, Ana Calderon ("Ana"), then age 39, gave birth to her third
11 child with Jiame Calderon at TRMC. There were no complications and mother and child went
12 home that same day. Dr. Ikedilo delivered the baby.
13

14 15. On October 14, 2015, Ana returned to TRMC and underwent a bilateral tubal
15 ligation performed by Dr. Ikedlio. The tubal ligation procedure ended at approximately 11:11
16 a.m.
17

18 16. According to Dr. Ikeldilo's operative notes, Ana was in "her usual state of good
19 health" when the tubal ligation began and at the end of tubal ligation there was "good" to
20 "excellent" hemostasis at the fallopian tube transections and the total estimated blood loss was
21 5ml.
22

23 17. Dr. Ikeldilo left the operating room immediately after the tubal ligation was
24 completed.

25 18. Within 15 minutes after the tubal ligation was completed, Ana's vital signs began
26 to "crash": her blood pressure fell to approximately 65/35 and her heart rate climbed to 120-130.
27

28 19. Plaintiffs are informed and believe that Dr. Ikedilo negligently transected an

1 artery during the tubal ligation which caused massive internal bleeding and a life-threatening
2 decrease in oxygen flow to vital organs, including the brain.

3 20. On October 14, 2014 at approximately 12:04 p.m., while still in the operating
4 room, Ana suffered her first cardiac arrest (code blue).

5 21. During the code, Dr. Ikeldilo was paged to return to the operating room but did
6 not return to the operating room until shortly before 1:00 p.m.

7 22. Despite the obvious signs of internal bleeding, exploratory surgery to find the
8 source of and treat the bleeding did not begin until about 1:00 p.m.

9 23. The first of two exploratory laparotomies was performed by Dr. Ikedilo from
10 approximately 1:00p.m. to 2:15 p.m. on October 14, 2014.

11 24. Plaintiffs are informed and believe that prior to the commencement of the first
12 exploratory laparotomy no blood products were administered.

13 25. According to Dr. Ikedilo's operative notes, a left oophorectomy was performed
14 during the first exploratory laparotomy, no arterial sources of bleeding were found and there was
15 excellent hemostasis at the close of the first exploratory laparotomy.

16 26. Ana was transferred to the Intensive Care Unit (ICU) after the first exploratory
17 laparotomy.

18 27. While in the ICU, Ana's vital signs again began to crash at about 5:15 p.m. By
19 5:45 p.m. her blood pressure was approximately 62/36 and her heart rate was elevated.

20 28. While in ICU Ana suffered a second cardiac arrest (code blue) at approximately
21 6:06 p.m.

22 29. Ana was taken to the operating room where a second exploratory laparotomy was
23 performed from approximately 6:17p.m. to 8:17 p.m. by Dr. Ikedilo and Dr. Rebecca Zulim.

30. During the second exploratory laparotomy an arterial source of bleeding was discovered.

31. Ana never regained consciousness after the tubal ligation and as a result of the internal bleeding, suffered irreversible anoxic brain injury.

32. On or about October 17, 2014, Ana was transferred to California Pacific Medical Center where she expired shortly thereafter.

33. As a result of the negligent care provided to Ana Calderon by Dr. Ikedilo and TRMC, Plaintiffs suffered severe physical and mental injuries, loss of support and economic injuries.

FIRST CAUSE OF ACTION

For Wrongful Death

(All Plaintiffs Against All Defendants)

34. Plaintiffs re-allege and incorporate by reference each and every allegation set forth in the preceding paragraphs.

35. During all periods of time during which Ana Calderon was a patient of Defendants, the Defendants, and each of them, agreed to perform and undertook to perform for Ana Calderon all services necessary to Ana Calderon's care, which included, but was not limited to, examination, evaluation, diagnosis, surgery, care and treatment of Ana Calderon, and in so doing, the Defendants, and each of them, established a relationship with Ana Calderon, giving rise to each Defendant's duty to Ana Calderon to provide skillful management of her health condition.

36. Defendants and each of them breached their duty to Ana Calderon to provide skillful management of her health condition, including but not limited to examination, diagnosis,

1 care and treatment of Ana Calderon.

2 37. At all times herein mentioned, Defendants and each of them so negligently and
3 carelessly cared for, treated and rendered medical services upon the person and body of Ana
4 Calderon and so negligently and carelessly operated, managed, controlled and conducted their
5 services, activities and supervision in connection with Ana Calderon's care and treatment that as
6 a direct and proximate result thereof Ana Calderon was caused to and did suffer the fatal injuries
7 herein alleged.

9 38. During said periods of time herein above alleged, Defendants and each of them,
10 were negligent, careless and unskillful in their management of the health of Ana Calderon,
11 including but not limited to the examination, diagnosis, surgery, care and treatment that were or
12 should have been provided to her.

14 39. The negligence of Defendants and each of them, includes but is not limited to the
15 following: performing an act and/or failing to perform an act which placed Ana Calderon into a
16 critical medical condition; failing to properly prevent, recognize, evaluate, or treat Ana
17 Calderon's critical condition in a timely manner; failing to transfer Ana Calderon to an
18 appropriate medical facility in a timely manner; and failing to otherwise treat her medical
19 condition in an appropriate manner.

21 40. As a direct and proximate result of the aforesaid negligence, carelessness and
22 unskillfulness of Defendants, and each of them, Ana Calderon suffered grave injuries including
23 pain, suffering and ultimately, death. Plaintiffs are informed and believe and thereon allege that
24 said death would not have occurred if not for the negligence of Defendants.

26 41. As a further direct and proximate result of the aforesaid negligence, carelessness
27 and unskillfulness of Defendants, Plaintiffs suffered, and will in the future continue to suffer
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1 pain, loss of enjoyment of life and other forms of severe mental and emotional distress and
2 anguish. Plaintiffs have been deprived of a kind and loving spouse and parent and of Ana
3 Calderon's care, comfort, society, protection, love, companionship, affection, solace, moral
4 support, physical assistance in the operation and maintenance of the home, and financial support.

5 42. As a further direct and legal result of the aforesaid negligence, carelessness and
6 unskillfulness of Defendants, and each of them, Plaintiff Jiame Calderon has incurred and will
7 continue to incur a loss of earnings and has incurred and will continue to incur expenses related
8 to the care of his three minor children as the result of the loss of their wife and mother.
9

10 43. As a further, direct and legal result of said negligence, carelessness and
11 unskillfulness of the Defendants, and each of them, Plaintiffs are entitled to prejudgment interest
12 under Code of Civil Procedure §998 and Civil Code §3291.
13

14 44. As a direct and proximate result of the death of the Ana Calderon, Plaintiffs have
15 incurred reasonable and necessary expenses for the Ana Calderon's funeral, burial, and memorial
16 services to their damage in a presently unascertained sum and which will be established
17 according to proof at trial.
18

19 PRAYER FOR RELIEF

20 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
21 follows:

- 22 1. For general damages according to proof;
23 2. For special damages according to proof;
24 3. For legal interest on judgment from the filing of this complaint to the date of
25 judgment;
26

27 //

1 4. For costs of suit;

2 5. And, for any other and further relief as the Court deems just and proper.

3
4 DATED: January 10, 2017

THE TRIAL LAW OFFICES OF
BRADLEY I. KRAMER, M.D., ESQ.
BRADLEY I. KRAMER

LAW OFFICE OF RAYMOND CHANDLER
RAYMOND CHANDLER

8
9 By  _____

10 Raymond Chandler,
11 Attorney for Plaintiffs Jiame Calderon,
12 Robert Calderon, Manuel Calderon and
13 Matthew Calderon
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EXHIBIT A

**DEPARTMENT OF HEALTH & HUMAN SERVICES**

Office of the General Counsel/General Law Division
Claims Office
330 C Street, S.W.
Switzer Building, Suite 2600
Washington, D.C. 20201
Ph: (202) 691-2369
Fax: (202) 691-2035

U. S. CERTIFIED MAIL—RETURN RECEIPT REQUESTED
(Article No. 7006 0100 0002 1488 9387)

Bradley I. Kramer, M.D., Esq.
Kramer & Willett, LLP
8840 Wilshire Boulevard, Suite 350
Beverly Hills, California 90211

Re: Administrative Tort Claim of Jaime Calderon, Claim No. 2016-0520

Dear Dr. Kramer:

On July 18, 2016, you filed an administrative tort claim under the Federal Tort Claims Act ("FTCA"). 28 U.S.C. §§ 1346(b), 2401(b), 2671-80, on behalf of your client, Jamie Calderon, alleging, *inter alia*, that, on October 14, 2015, Dr. Adanna Ikedilo and Tulare Community Health Clinic, located in Tulare, California, committed medical malpractice by negligently dissecting an artery during a tubal ligation; and, thereafter, not performing a timely and proper exploratory laparotomy to repair the artery, resulting in the death of Mrs. Calderon on October 24, 2015.

The FTCA authorizes the settlement of any claim of money damages against the United States for, *inter alia*, injury or death caused by the negligent or wrongful act or omission of any employee of the federal government, while acting within the scope of employment. Under the FTCA, said act or omission must be such that the United States, if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred. 28 U.S.C. § 2672.

This letter constitutes the notice of final determination of this administrative tort claim, as required by 28 U.S.C. §§ 2401(b), 2675(a). The administrative tort claim of Jamie Calderon is denied. The evidence fails to establish that the alleged injuries were due to the negligent or wrongful act or omission of a federal employee acting within the scope of employment.

If your client is dissatisfied with this determination, she may:

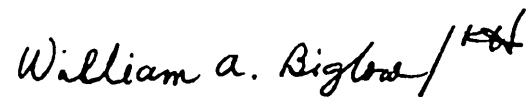
1. file a written request with the Agency for reconsideration of the final determination denying the claim within six (6) months from the date of mailing of this determination (28 C.F.R. § 14.9); or

Page 2- Bradley I. Kramer, M.D., Esq.

2. file suit against the United States in the appropriate federal district court within six (6) months from the date of mailing of this determination (28 U.S.C. § 2401(b)).

In the event your client requests reconsideration, the Agency will review the administrative tort claim within six (6) months from the date the request is received. If the reconsidered administrative tort claim is denied, she may file suit within six (6) months from the date of mailing of the final determination.

Sincerely yours,

A handwritten signature in black ink that reads "William A. Biglow" followed by a stylized flourish or mark.

William A. Biglow
Deputy Associate General Counsel
Claims and Employment Law Branch

EXHIBIT B

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EXHIBIT B

DECLARATION OF BRADLEY I. KRAMER

I, BRADLEY I. KRAMER, declare as follows:

1. I am a medical doctor and an attorney licensed to practice before the courts of the State of California and this District Court, and I am one of the attorneys representing the Plaintiffs in this action. I have personal knowledge of the facts set forth herein, except as to those matters stated on information and belief, and as to those matters I believe them to be true. If called to testify I could and would testify competently therefore.

2. I have extensive experience representing minors and/or individuals requiring guardians in medical negligence and wrongful death actions. A few of the aforesaid actions are:

Gallegos v. Children's Hospital, et al.
Orange County; Case No. 30-2014-00701815
January 2014

Hawken v. Providence Health, et al.
Los Angeles, Case No. BC562275
October 2014

Freeman v. Hollywood Presbyterian, et al.
Los Angeles, Case No. BC624985
June 2016

3. If approved by the Court I will competently and adequately represent the minors in this action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 3, 2017 in Los Angeles County, California.



BRADLEY I. KRAMER, M.D., ESQ.

EXHIBIT C

EXHIBIT CDECLARATION OF JIAME CALDERON

I, JIAME CALDERON, declare as follows:

1. I am one of the Plaintiffs in this action. I have personal knowledge of the facts set forth herein, except as to those matters stated on information and belief, and as to those matters I believe them to be true. If called to testify I could and would testify competently therefore.

2. I am the husband of Ana Calderon (now deceased) and the natural and legal father of the three minor Plaintiffs in this action: Anna Calderon (deceased): R C, M C and

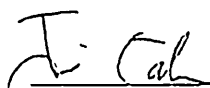
M C

3. I consent to the representation of the minor children by Bradley Kramer and Raymond Chandler and I am confident that they will competently and adequately represent the children.

4. True and correct copies of the birth certificates of R C, M C and M C evidencing that I am their father are attached hereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 9, 2017 in Tulare County, California.


JIAME CALDERON

STATE OF CALIFORNIA					
CERTIFICATION OF VITAL RECORD					
COUNTY of CONTRA COSTA					
MARTINEZ, CALIFORNIA					
REDACTED					
STATE FILE NUMBER			LOCAL REGISTRATION DISTRICT AND CERTIFICATE NUMBER		
12. NAME OF CHILD — FIRST (GIVEN)			10. LAST		
R			C		
13. MIDDLE			14. DATE OF BIRTH — MM/DD/YYYY		
Z			1/2003		
15. SEX			16. HOUR — (24 HOUR CLOCK TIME)		
MALE			0524		
17. THIS BIRTH, SINGLE, TWIN, ETC.			18. IF MULTIPLE, THIS CHILD		
SINGLE			1ST, 2ND, ETC.		
19. PLACE OF BIRTH — NAME OF HOSPITAL OR FACILITY			20. STREET ADDRESS — STREET, NUMBER, OR LOCATION		
CONTRA COSTA REGIONAL MED CTR			2500 ALHAMBRA AVE.		
21. CITY			22. COUNTY		
MARTINEZ			CONTRA COSTA		
23. PLANNED PLACE OF BIRTH			24. STATE OF BIRTH		
HOSPITAL			CA		
25. DATE OF BIRTH			26. DATE OF BIRTH		
01/10/1977			12/01/1976		
27. NAME OF FATHER — FIRST (GIVEN)			28. MIDDLE		
JIANE			CALDERON		
29. NAME OF MOTHER — FIRST (GIVEN)			30. MIDDLE		
ANA			MARIE		
31. LAST (FAMILY)			32. LAST (MOTHER)		
PENA			PENA		
33. RELATIONSHIP TO CHILD			34. DATE SIGNED		
FATHER			1/2003		
35. LICENSE NUMBER			36. DATE SIGNED		
RESIDENT			12/02/2003		
37. TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT			38. TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT		
SCOTT AKIN, MD, 2500 ALHAMBRA AVE, MARTINEZ					
39. DATE OF DEATH			40. STATE FILE NO.		
			(STATE USE ONLY)		
41. LOCAL REGISTRAR — SIGNATURE			42. DATE ACCEPTED FOR REGISTRATION		
WENDEL BRUNNER, M.D.			12/08/2003		

REDACTED

CERTIFIED COPY OF VITAL RECORDS

STATE OF CALIFORNIA } SS
COUNTY OF CONTRA COSTA

This is a true and exact reproduction of the document officially registered and placed on file in the office of the CONTRA COSTA COUNTY RECORDER.

ATTEST: *[Signature]* NOV 08 2004
CONTRA COSTA COUNTY RECORDER

DATE ISSUED: _____

This copy not valid unless prepared on engraved border displaying date and signature of Deputy Recorder.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

Case 1:17-cv-00040-DAD-BAM Document 1 Filed 01/11/17 Page 17 of 21

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY of TULARE
VISALIA, CALIFORNIA

REDACTED

CERTIFICATE OF LIVE BIRTH
STATE OF CALIFORNIA
USE BLACK INK ONLY

1201454004610

LOCAL REGISTRATION NUMBER

THIS CHILD	1A NAME OF CHILD - FIRST M		1B MIDDLE CH		1C LAST CH	
	2 SEX MALE	3A THIS BIRTH SINGLE, TWIN, ETC SINGLE	3B IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC		4A DATE OF BIRTH - MM/DD/YYYY /2014	4B HOUR - 24 HOUR CLOCK TIME 0009
PLACE OF BIRTH	5A PLACE OF BIRTH - NAME OF HOSPITAL OR FACILITY TULARE REGIONAL MEDICAL CENTER		5B STREET ADDRESS - STREET AND NUMBER OR LOCATION 869 CHERRY STREET			
	5C CITY TULARE		5D COUNTY TULARE			
FATHER	6A NAME OF FATHER/PARENT - FIRST JIAME		6B MIDDLE -		6C LAST CALDERON	
	6A NAME OF MOTHER/PARENT - FIRST ANA		6B MIDDLE MARIE		6C LAST - BIRTH NAME PENA	
INFORMANT AND BIRTH CERTIFICATION	7 BIRTHPLACE - STATE/COUNTRY CA		8 DATE OF BIRTH - MM/DD/YYYY 01/10/1977			
	9 BIRTHPLACE - STATE/COUNTRY CA		10 DATE OF BIRTH - MM/DD/YYYY 12/01/1976			
	11 I CERTIFY THAT I HAVE REVIEWED THE STATISTICAL INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE		12A PARULIT OR OTHER 2nd FORMANT - SIGNATURE <i>Ana Calderon</i>		12B RELATIONSHIP TO CHILD MOTHER	
	11 I CERTIFY THAT THE CHILD WAS BORN ALIVE AT THE DATE, HOUR, AND PLACE STATED		12A ATTENDANT/CERTIFIER - SIGNATURE AND DEGREE OR TITLE <i>Laudreyne</i>		12B LICENSE NUMBER A116188	
13D TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT LAN THUY TRUONG, MD, 1201 CHERRY STREET, TULARE		14 TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT				
15A DATE OF DEATH - MM/DD/YYYY	15B STATE AND COUNTY - STATE USE ONLY	15C LOCAL REGISTRAR - SIGNATURE KAREN HAUGHT, M.D.		17 DATE ACCEPTED FOR REGISTRATION - MM/DD/YYYY 09/08/2014		

REDACTED

This is a true and exact reproduction of the document officially registered and placed on file in the office of the Tulare County Recorder.



Roland P. Hill
ROLAND P. HILL
ASSESSOR/CLERK-RECORDER
COUNTY OF TULARE

MAY 20 2015
DATE ISSUED

This copy not valid unless prepared on engraved border displaying date, seal and signature of the County Recorder.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

COUNTY OF TULARE

CERTIFICATION OF VITAL RECORDS

OFFICE OF VITAL RECORDS

COUNTY OF TULARE

TULARE, CALIFORNIA

REDACTED

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA

1201554005408

STATE FILE NUMBER

LOCAL REGISTRATION NUMBER

USE BLACK INK ONLY

THIS CHILD	1A. NAME OF CHILD - FIRST M7	1B. MIDDLE C	1C. LAST C		
	2. SEX MALE	3A. THIS BIRTH, SINGLE, TWIPLE, ETC. SINGLE	3B. IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC. 1	4A. DATE OF BIRTH - MM/DD/YYYY 2015	4B. HOUR - 24 HOUR CLOCK TIME 0636
PLACE OF BIRTH	5A. PLACE OF BIRTH - NAME OF HOSPITAL OR FACILITY TULARE REGIONAL MEDICAL CENTER		5B. STREET ADDRESS - STREET AND NUMBER, OR LOCATION 869 CHERRY STREET		
	5C. CITY TULARE		5D. COUNTY TULARE		
FATHER/PARENT	6A. NAME OF FATHER/PARENT - FIRST JIANE	6B. MIDDLE -	6C. LAST CALDERON	7. BIRTH PLACE - STATE/COUNTRY CA	8. DATE OF BIRTH - MM/DD/YYYY 01/10/1977
	9A. NAME OF MOTHER/PARENT - FIRST ANA	9B. MIDDLE MARIE	9C. LAST, BIRTH NAME PENA	10. BIRTH PLACE - STATE/COUNTRY CA	11. DATE OF BIRTH - MM/DD/YYYY 12/01/1976
INFORMANT AND BIRTH CERTIFICATION	12A. I CERTIFY THAT I HAVE REVIEWED THE STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.		12B. PARENT OR OTHER INFORMANT - SIGNATURE <i>Ana Calderon</i>		12C. RELATIONSHIP TO CHILD MOTHER
	12D. I CERTIFY THAT THE CHILD WAS BORN ALIVE AT THE DATE, HOUR, AND PLACE STATED.		12E. ATTENDANT/CERTIFIER - SIGNATURE AND DEGREE OR TITLE <i>A. Pangman</i>		12F. DATE SIGNED - MM/DD/YYYY 2015
	13. TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT KIN PANG, MD, 1101 CHERRY STREET, TULARE		13B. LICENSE NUMBER G65767		13C. DATE SIGNED - MM/DD/YYYY 10/20/15
			14. TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT		
LOCAL REGISTRATION	15A. DATE OF DEATH - MM/DD/YYYY	15B. STATE FILE NO. - STATE USE ONLY	16. LOCAL REGISTRAR - SIGNATURE KAREN HAUGHT, M.D. <i>KS</i>	17. DATE ACCEPTED FOR REGISTRATION - MM/DD/YYYY 10/22/2015	

REDACTED

CERTIFIED COPY OF VITAL RECORDS
STATE OF CALIFORNIA, COUNTY OF TULARE

This is a true and exact reproduction of the document officially registered and placed on file in the VITAL STATISTICS OFFICE, COUNTY OF TULARE HEALTH AND HUMAN SERVICE AGENCY.

DATE ISSUED FEB 22 2016

Karen Haught
 Karen Haught, M.D., M.P.H., Tulare County Health Officer
 Registrar of Vital Statistics

This copy is not valid unless prepared on an engraved border, displaying date, seal and signature of the County Health Officer.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



* 000327063 *



Case 1:17-cv-00040-DAD-BAM Document 1 Filed 01/11/17 Page 20 of 21

CIVIL COVER SHEET

JS-44 (Rev. 12/12)

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Calderon, Jaime; C, R a minor;
C, M a minor; C, M a minor

(b) County of Residence of First Listed Plaintiff Tulare
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

The Trial Law Offices of Bradley J. Kramer
8840 Wilshire Blvd., Suite 350
Beverly Hills, CA 90211 (310) 289-2600 (see attachment)

DEFENDANTS

Ikedilo, Adanna, MD;
Tulare Regional Medical Center
(U. S. DHHS)

County of Residence of First Listed Defendant Tulare
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Unknown

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT/PROPERTY	PERSONAL INJURY	PERSONAL INJURY	FOREIGN/PROPERTY	SECURITY/PROPERTY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 130 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 160 Other Contract <input type="checkbox"/> 175 Contract Product Liability <input type="checkbox"/> 186 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input checked="" type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 520 Copyrights <input type="checkbox"/> 530 Patent <input type="checkbox"/> 540 Trademark <input type="checkbox"/> 561 HIA (1950) <input type="checkbox"/> 562 Black Lung (923) <input type="checkbox"/> 563 DIWC/DIWW (405(g)) <input type="checkbox"/> 564 SSID Title XVI <input type="checkbox"/> 565 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 550 Securities/Commodities Exchange <input type="checkbox"/> 590 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISON/REPLECTIONS	IMMIGRATION	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 250 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 510 Habeas Corpus <input type="checkbox"/> 515 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 402 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 570 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 571 IRS - Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (Specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity): 38 USC 7316

Brief description of cause: Wrongful death due to medical malpractice

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.C.P. DEMAND \$ \$1,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE 1-10-17

SIGNATURE OF ATTORNEY OF RECORD

Bradley J. Kramer

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ INDEX _____ MAG. JUDGE _____

ATTACHMENT TO CIVIL CASE COVER SHEET

Case: Calderon et al. v. Ikedilo, et al.

1(c) Attorneys. Plaintiff

The Law Office of Raymond Chandler
15 W. Carrillo Street, Suite 220
Santa Barbara, CA 93101
805-965-1999